

RM-10352 RESPONSE - INTRODUCTION: I was first licensed in 1948, upgraded to extra class in 1952, and now hold the call sign K3DI. Since automating my US HF log in 1987, I have had over 77,000 communications (62% on CW and 38% on voice) mostly during contests. I have had over 10,000 additional contacts (80% on CW) while operating in 10 foreign countries. I am a semi-retired Electronic Engineer doing consulting for a Government Agency and a non-profit organization on frequency management matters. These are my PERSONAL comments.

DENIAL OF RM-10352: Based on my operation in the 1.800-2.000 MHz (160 meter) band, augmented with many evenings of monitoring during the past four weeks, it is my conclusion that the proposal of RM-10352 should be denied. It is an attempt to use a static solution to solve what appears as a rather infrequent dynamic problem, appears to oppose good frequency management, is projected to create considerable friction between voice and CW operators, and is just not needed because it is somewhat redundant with the self imposed dynamic band plan. Though the petition was submitted by CW operators, it will probably reduce the frequency space available for the CW contest operator who believes in fair play and will not operate above 1.843 MHz if that is designated as a voice band.

SPECTRUM NEED: For many years, there has been an informal frequency division between the CW and SSB operations in the 160 meter band. During periods of casual communications (non-contests), traffic is usually sufficiently light that a suitable voluntary division of the band occurs with CW operation in the lower 35 kHz (more or less) and SSB from that frequency up to 2.000 MHz. However, during single band single mode 160 meter contests, there is an extraordinary demand for spectrum such that (based on my observations) it is typically necessary for CW station to use 1.800 to 1.880 MHz two weekends each year and SSB station to use 1.800 to 1.925 MHz on one weekend each year. See footnote.\*

FRICITION BETWEEN OPERATORS: The FCC rules for the other HF amateur band restrict voice emissions to a portion of each band and allows CW to operate over the entire band. However, due to a reasonable feeling of fair play, CW operation in the SSB portion of other HF bands so divided is extremely rare and when it does occur, the CW operator is immediately chastised by SSB operators. Without a specific sub-band division in the 160 meter band, the ARS operators seem to make adjustments to the division of the band based on spectrum needs as stated in the prior paragraph. However, if a sub-band wall is built at 1.843 MHz then that will likely be a basis for SSB operators to reasonably complain if CW operation occurs above 1.843 MHz. If RM-10532 were implemented and the "fair play" custom migrates to 160 meters, then CW operators would face the dilemma of inadequate spectrum below 1.843 MHz during contests or being chastised by SSB operators for operating CW above 1.843 MHz. In the two cited CW contest, due to the heavy traffic, I expect that CW stations will be forced into the SSB band with the result of gravely impacting inter-modal relationships.

FREQUENCY ALLOCATIONS: The band 1.800-1.900 MHz is allocated on a primary basis to the ARS while the band 1.900-2.000 MHz is allocation to the Radiolocation service on a primary basis with the ARS as secondary per footnote US490. My concern is that during a SSB contest, if SSB stations are denied the portion below 1.843 MHz, then (based on a heavy traffic demand of approximately 125 kHz) the SSB stations would be forced up to 1.843 to 1.968 MHz which would increase the potential of interference to the primary service above 1.900 MHz. Based on the allocation status of the ARS it would prudent to minimize the contest operating above 1.900 MHz.

ANTENNA BANDWIDTH: Antenna size restrictions often limit the antenna bandwidth on the 160 meter band. In cases where a licensee operates both contest modes, it is convenient not to need to retune between CW or SSB contest weekends where retuning may require dropping wires that are hung between trees to change the antenna lengths or climbing a tower to change a matching section. An antenna tuner can't be used to accomplish the frequency change because in a modern contest station, the transmission frequency is usually under computer control resulting in the capability and need to instantly jump as much as 100 kHz without retuning when the target communication frequency and call sign is retrieved directly from a VHF/UHF packet communication system and put into the radio and log. A side advantage of the continuation of both contest modes using the lower portion of the 160 meter band is that it will make more spectrum available to non-contesters using SSB in the upper portion of the band.

CONCLUSION: I belive RM-10352 should be denied and that the 160 meter band can be more fully utilized with a continuation of the self imposed inter-modal dynamic division of the 160 meter band. In rare cases where a clash occurs between station, I belive rule 97.101d and use of the ARRL band plan as a guide, is quite sufficient.

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\* There are three such contests each year that drastically change the need of inter-nodal division on the 160 meter band. The contests are the CQ magazine CW contest held the last week end of January, the CQ magazine SSB contest held the last week end of February, and the ARRL CW contest held the second weekend of December. It is noted that the singular SSB contest will be held from 5:00 PM ET February 22 to 11 AM ET February 24, 2002 with operation mostly during the night hours. It appears that RM-10352 was submitted for rule making to force a realignment of the band usage during this one weekend each year.